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Technical and Administrative Service,  
Plant Biosecurity,  
Department of Agriculture, Fisheries and Forestry,  
GPO Box 858,  
CANBERRA ACT 2601

Dear Sir/Madam.

As apples growers in the Batlow district of NSW we totally reject Biosecurity's latest Risk Analysis Report on the introduction of apples from New Zealand. We believe that this IRA, if approved, will allow the entry of Fireblight into Australia, leading to the devastation of the apple and pear industry, not only in our community of Batlow, but throughout Australia.

The suggested protocols in the latest Risk Analysis Report include an orchard inspection at blossom time with only orchards that are free of fire blight symptoms able to export apples to Australia. Because outbreaks can occur at other times besides Spring, surely these inspections should be repeated just prior to harvest.

Additional inspections should take place in orchards where events have occurred which damage the foliage of trees, because evidence is available that indicates that damaged leaves provide entry to fire blight and therefore such orchards will be more susceptible to infection.

The IRA suggests that trash is not a risk to fire blight infection of apples. This is an issue which has been disproved in every IRA previously put forward by Biosecurity. Evidence shows that trash is a high risk vector and therefore all trash should be excluded from all exports.

Also excluded should be orchard blocks which have had infections of fire blight in the previous year because of the higher risk of an outbreak in the following year. Why does the IRA ignore this, by treating all blocks as if the risk is the same? Also the protocols should exclude blocks which are in close proximity to fire blight infected orchards because it is obvious that where an outbreak occurs nearby, there is an increased risk.

To exclude infestations of insects, it is necessary that fumigation procedures be included in the protocol. All apple exports from New Zealand to Australia should be fumigated to ensure that insects not present in Australia eg apple leaf curling midge are not imported along with apples.

New Zealand has the devastating European Canker which is difficult to detect when fruit is inspected. Why has the IRA not excluded fruit from the areas in New Zealand where the risk is highest?

The inspection protocols in the latest version of Biosecurity's IRA are inadequate and give us as apple growers no confidence that fire blight will be kept out of Australia.

As Biosecurity is dealing with the livelihood of apple and pear growers in Australia, one would have hoped for more appreciation of the dire consequences facing those growers should your risk analysis be as faulty as it appears.

Why do we as growers have to defend our Fireblight free status every few years? Why do we have to bear the risk of our industry and importantly our communities being wiped out by the introduction of Fireblight? In other countries Governments support their farmers – here we have to fight to keep our orchards disease free and to fight for the viability of our farms.

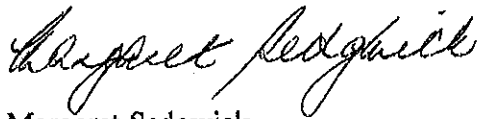
Biosecurity has lost the confidence, and more importantly, the respect and trust of growers because of its obvious desire to create a "least restrictive trade" access for New Zealand apples. The revised draft IRA is obviously biased with the above in mind, confusing science and trade. It is also biased to the extent of ignoring available scientific evidence that gives contrary points of view to that used by Biosecurity in the revised draft IRA.

The Risk Analysis is flawed, the protocols of inspection of little value, and we reject once again the draft Report.

Yours faithfully,



Richard Sedgwick



Margaret Sedgwick